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*Attorney for Defendant The Commonwealth of the
 Northern Mariana Islands*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS**

**IMPERIAL PACIFIC INTERNATIONAL
 (CNMI), LLC**

Plaintiff,

v.

**COMMONWEALTH OF THE NORTHERN
 MARIANA ISLANDS;
 COMMONWEALTH CASINO
 COMMISSION, ARNOLD PALACIOS,
 Governor of CNMI, in his official and
 personal capacities; EDWARD C. DELEON
 GUERRERO, Chairman of CCC, in his
 official and personal capacities; RAFAEL S.
 DEMAPAN, Vice Chairman of CCC, in his
 official and personal capacities; MARIANO
 TAITANO, Commissioner of CCC, in his
 official and personal capacities; MARTIN
 MENDIOLA, Commissioner of CCC, in his
 official and personal capacities; RAMON M.
 DELA CRUZ, Commissioner of CCC, in his
 official and personal capacities; and
 ANDREW YEOM, Executive Director of
 CCC, in his official and personal capacities.**

Defendants.

CIVIL CASE NO. 1:24-cv-00001

**THE COMMONWEALTH OF THE
 NORTHERN MARIANA ISLANDS'
 MOTION TO DISMISS SECOND
 AMENDED COMPLAINT PURSUANT
 TO FEDERAL RULE OF CIVIL
 PROCEDURE 12(b)(1) and (6)**

Defendant, The Commonwealth of the Northern Mariana Islands, by and through its
 counsel of record, Chief Solicitor, J. Robert Glass, Jr., moves this Court to dismiss Plaintiff's
 Second Amended Complaint pursuant to Federal Rules of Civil Procedure 8(a), 17(b)(2),

1 12(b)(1), and 12(b)(6). This Motion is accompanied by a legal memorandum of points and
2 authorities. *See* Local Rule 7.1(b).

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4 Respectfully submitted: August 13, 2024

OFFICE OF THE ATTORNEY GENERAL
EDWARD MANIBUSAN
ATTORNEY GENERAL

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7 /s/ J. Robert Glass, Jr.
J. ROBERT GLASS, JR. (F0523)
Chief Solicitor

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10 **CERTIFICATE OF SERVICE**

11 I hereby certify that the above and foregoing was electronically filed on August 13, 2024,
12 with service requested to all parties of record.

13 /s/ J. Robert Glass, Jr.
14 J. ROBERT GLASS, JR. (F0523)
Chief Solicitor